

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEBRASKA

UNITED STATES OF AMERICA,

Plaintiff,

vs.

RICARDO D. PEACOCK,

Defendant.

FILED
U.S. DISTRICT COURT
DISTRICT OF NEBRASKA
2018 AUG 22 PM 1:15
OFFICE OF THE CLERK

8:18 CR 218

INDICTMENT

18 U.S.C. § 1001

The Grand Jury charges that

COUNT I

On or about the 14th day of January, 2015, RICARDO D. PEACOCK, the defendant, within the District of Nebraska, did willfully and knowingly make a materially false, fictitious, and fraudulent statement and representation in a matter within the jurisdiction of the executive branch of the Government of the United States, specifically, while RICARDO D. PEACOCK, the defendant, was employed as an Occupational Safety and Health Administration (OSHA) Compliance Safety and Health Officer, he submitted an OSHA Inspection Report which claimed he had conducted an inspection on January 13, 2015, of a work site located at 4614 Cuming Street, Omaha, Nebraska, which was operated by Herman Engraving, when, as RICARDO D. PEACOCK, the defendant, then and there knew, he had not conducted an inspection of that worksite on or about January 13, 2015.

In violation of Title 18, United States Code, Section 1001.

COUNT II

On or about the 27th day of February, 2015, RICARDO D. PEACOCK, the defendant, within the District of Nebraska, did willfully and knowingly make a materially false, fictitious,

and fraudulent statement and representation in a matter within the jurisdiction of the executive branch of the Government of the United States, specifically, while RICARDO D. PEACOCK, the defendant, was employed as an Occupational Safety and Health Administration (OSHA) Compliance Safety and Health Officer, he submitted an OSHA Inspection Report which claimed he had conducted an inspection on February 10, 2015, of a work site located at 2719 Halligan Drive, North Platte, Nebraska, which was operated by Peripety, LLC doing business as Pro Printing and Graphics, when, as RICARDO D. PEACOCK, the defendant then and there knew, he had not conducted an inspection of that worksite on or about February 10, 2015.

In violation of Title 18, United States Code, Section 1001.

COUNT III

On or about the 23rd day of March, 2015, RICARDO D. PEACOCK, the defendant, within the District of Nebraska, did willfully and knowingly make a materially false, fictitious, and fraudulent statement and representation in a matter within the jurisdiction of the executive branch of the Government of the United States, specifically, while RICARDO D. PEACOCK, the defendant, was employed as an Occupational Safety and Health Administration (OSHA) Compliance Safety and Health Officer, he submitted an OSHA Inspection Report which claimed he had conducted an inspection on March 20, 2015, of a work site located at 5503 Bell Road, Lincoln, Nebraska, which was operated by TCW Construction, Inc., when, as RICARDO D. PEACOCK, the defendant then and there knew, he had not conducted an inspection of that worksite on or about March 20, 2015.

In violation of Title 18, United States Code, Section 1001.

COUNT IV

On or about the 29th day of September, 2015, RICARDO D. PEACOCK, the defendant, within the District of Nebraska, did willfully and knowingly make a materially false, fictitious, and fraudulent statement and representation in a matter within the jurisdiction of the executive branch of the Government of the United States, specifically, while RICARDO D. PEACOCK, the defendant, was employed as an Occupational Safety and Health Administration (OSHA) Compliance Safety and Health Officer, he submitted an OSHA Inspection Report which claimed he had conducted an inspection on June 30, 2015, of a work site located at 9364 North 45th Street, Omaha, Nebraska, which was operated by Nebraska Engineering Company, a Division of Global Industries, Inc., when, as RICARDO D. PEACOCK, the defendant then and there knew, he had not conducted an inspection of that worksite on or about June 30, 2015.

In violation of Title 18, United States Code, Section 1001.

COUNT V

On or about the 25th day of September, 2015, RICARDO D. PEACOCK, the defendant, within the District of Nebraska, did willfully and knowingly make a materially false, fictitious, and fraudulent statement and representation in a matter within the jurisdiction of the executive branch of the Government of the United States, specifically, while RICARDO D. PEACOCK, the defendant, was employed as an Occupational Safety and Health Administration (OSHA) Compliance Safety and Health Officer, he submitted an OSHA Inspection Report which claimed he had conducted an inspection on July 23, 2015, of a work site located at 6500 Fletcher Avenue, Lincoln, Nebraska, which was operated by GlaxoSmithKline, LLC, when, as RICARDO D. PEACOCK, the defendant then and there knew, he had not conducted an inspection of that worksite on or about July 23, 2015.

In violation of Title 18, United States Code, Section 1001.

COUNT VI

On or about the 28th day of July, 2015, RICARDO D. PEACOCK, the defendant, within the District of Nebraska, did willfully and knowingly make a materially false, fictitious, and fraudulent statement and representation in a matter within the jurisdiction of the executive branch of the Government of the United States, specifically, while RICARDO D. PEACOCK, the defendant, was employed as an Occupational Safety and Health Administration (OSHA) Compliance Safety and Health Officer, he submitted an OSHA Inspection Report which claimed he had conducted an inspection on July 28, 2015, of a work site located at 915 Jones Street, Omaha, Nebraska, which was operated by Brester Constriction, Inc., when, as RICARDO D. PEACOCK, the defendant then and there knew, he had not conducted an inspection of that worksite on or about July 28, 2015.

In violation of Title 18, United States Code, Section 1001.

COUNT VII

On or about the 11th day of January, 2016, RICARDO D. PEACOCK, the defendant, within the District of Nebraska, did willfully and knowingly make a materially false, fictitious, and fraudulent statement and representation in a matter within the jurisdiction of the executive branch of the Government of the United States, specifically, while RICARDO D. PEACOCK, the defendant, was employed as an Occupational Safety and Health Administration (OSHA) Compliance Safety and Health Officer, he submitted an OSHA Inspection Report which claimed he had conducted an inspection on September 15, 2015, of a work site located at 700 R Street, Lincoln, Nebraska, which was operated by the United States Postal Service, when, as RICARDO

D. PEACOCK, the defendant then and there knew, he had not conducted an inspection of that worksite on or about September 15, 2015.

In violation of Title 18, United States Code, Section 1001.

COUNT VIII

On or about the 2nd day of March, 2016, RICARDO D. PEACOCK, the defendant, within the District of Nebraska, did willfully and knowingly make a materially false, fictitious, and fraudulent statement and representation in a matter within the jurisdiction of the executive branch of the Government of the United States, specifically, while RICARDO D. PEACOCK, the defendant, was employed as an Occupational Safety and Health Administration (OSHA) Compliance Safety and Health Officer, he submitted an OSHA Inspection Report which claimed he had conducted an inspection on November 24, 2015, of a work site located at 8700 Andermatt Drive, Lincoln, Nebraska, which was operated by Walmart Stores, when, as RICARDO D. PEACOCK, the defendant then and there knew, he had not conducted an inspection of that worksite on or about November 24, 2015.

In violation of Title 18, United States Code, Section 1001.

COUNT IX

On or about the 19th day of February, 2016, RICARDO D. PEACOCK, the defendant, within the District of Nebraska, did willfully and knowingly make a materially false, fictitious, and fraudulent statement and representation in a matter within the jurisdiction of the executive branch of the Government of the United States, specifically, while RICARDO D. PEACOCK, the defendant, was employed as an Occupational Safety and Health Administration (OSHA) Compliance Safety and Health Officer, he submitted an OSHA Inspection Report which claimed he had conducted an inspection on December 2, 2015, of a work site located at 10607 Harrison

Street, La Vista, Nebraska, which was operated by Colonial Press, Inc., when, as RICARDO D. PEACOCK, the defendant then and there knew, he had not conducted an inspection of that worksite on or about December 2, 2015.

In violation of Title 18, United States Code, Section 1001.

COUNT X

On or about the 3rd day of March, 2016, RICARDO D. PEACOCK, the defendant, within the District of Nebraska, did willfully and knowingly make a materially false, fictitious, and fraudulent statement and representation in a matter within the jurisdiction of the executive branch of the Government of the United States, specifically, while RICARDO D. PEACOCK, the defendant, was employed as an Occupational Safety and Health Administration (OSHA) Compliance Safety and Health Officer, he submitted an OSHA Inspection Report which claimed he had conducted an inspection on December 4, 2015, of a work site located at 1430 East 34th Street, Wahoo, Nebraska, which was operated by The Fab Shop, Inc., when, as RICARDO D. PEACOCK, the defendant then and there knew, he had not conducted an inspection of that worksite on or about December 4, 2015.

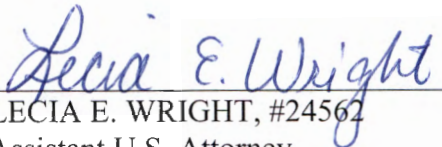
In violation of Title 18, United States Code, Section 1001.

A TRUE BILL.

FOREPERSON

The United States of America requests that trial of this case be held in Omaha, Nebraska, pursuant to the rules of this Court.

By:


LECIA E. WRIGHT, #24562
Assistant U.S. Attorney